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| 1 | JONATHAN O. PENA, ESQ. CA Bar ID No. 278044 | | |
|----|--|---|--|
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| 4 | Telephone: 559-412-5390 | | |
| 5 | Fax: 866-282-6709 info@jonathanpena.com | | |
| 6 | Attorney for Plaintiff | | |
| 7 | | | |
| 8 | UNITED STATES DISTRICT COURT | | |
| 9 | EASTERN DISTRICT OF CALIFORNIA | | |
| 10 | | | |
| 11 | ARTHUR LEE WILLIAMS, | Case No. 1:22-cv-01294-EPG | |
| 12 | Plaintiff, | ORDER RE: STIPULATION FOR EXTENSION OF TIME | |
| 13 | vs. | (ECF No. 14). | |
| 14 | COMMISSIONER OF SOCIAL SECURITY, |)) | |
| 15 | |)) | |
| 16 | Defendant. |)) | |
| 17 | |)) | |
| 18 | | | |
| 19 | IT IS HEREBY STIPULATED, by and between the parties through their respective | | |
| 20 | counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time | | |
| 21 | from March 27, 2023 to May 26, 2023, for Plaintiff to serve on defendant with Plaintiff's Motio | | |
| 22 | for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended | | |
| 23 | accordingly. | | |
| 24 | This is Plaintiff's second request for an extension of time. Good cause exists for the | | |
| 25 | requested extension. For the weeks of March 27, 2023 and April 3, 2023, Counsel currently has | | |
| 26 | 31 merit briefs, and several letter briefs and reply briefs. This includes cases that undersigned | | |
| 27 | counsel took on during co-counsel's, Dolly M. Trompeter, leave of absence. Additional time is | | |

needed to thoroughly brief this matter for the Court.

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| 1 | Cornect for Disjutiff is commenter taking montial leave as his shild was how an October 1 | | |
|----|---|--|--|
| 1 | Counsel for Plaintiff is currently taking partial leave as his child was born on October 14 | | |
| 2 | 2022. Thus, Counsel is working limited hours for the months of December 2022 through March | | |
| 3 | 2023 (with a possible extension of parental leave). | | |
| 4 | Additionally, Counsel underwent major surgery on March 15, 2023, requiring post-op | | |
| 5 | physical therapy, with the need for several breaks throughout the workday. | | |
| 6 | Defendant does not oppose the requested extension. Counsel apologizes to the Defendar | | |
| 7 | and Court for any inconvenience this may cause. | | |
| 8 | | | |
| 9 | Respectfully submitted, | | |
| 10 | Dated: March 27, 2023 PENA & BROMBERG, ATTORNEYS AT LAW | | |
| 11 | | | |
| 12 | By: <u>/s/ Jonathan Omar Pena</u> JONATHAN OMAR PENA | | |
| 13 | Attorneys for Plaintiff | | |
| 14 | | | |
| 15 | Dated: March 27, 2023 PHILLIP A. TALBERT | | |
| 16 | United States Attorney | | |
| 17 | MATHEW W. PILE Associate General Counsel | | |
| 18 | Office of Program Litigation | | |
| 19 | Social Security Administration | | |
| 20 | By: */s/ L. Jamala Edwards | | |
| 21 | L. Jamala Edwards | | |
| 22 | Special Assistant United States Attorney Attorneys for Defendant | | |
| 23 | (*As authorized by email on March 27, 2023) | | |
| 24 | | | |
| 25 | | | |
| 26 | | | |
| 27 | | | |
| 28 | | | |
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ORDER Based on the parties' stipulation (ECF No. 14), Plaintiff shall file Plaintiff's motion for summary judgment by May 26, 2023. All other dates in the Court's scheduling order shall be extended accordingly. IT IS SO ORDERED. 1st Encir P. Grong Dated: March 28, 2023 UNITED STATES MAGISTRATE JUDGE